

**Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001**

STATUTORY REVIEW OF THE SYSTEM
FOR REGULATING RATES AND CLASSES
FOR MARKET DOMINANT PRODUCTS

Docket No. RM2017-3

MOTION FOR LATE ACCEPTANCE OF COMMENTS

The National Postal Mail Handlers Union (“NPMHU”) hereby moves for late acceptance of its Comments on Revised Notice of Proposed Rulemaking, provided in response to the Commission’s December 5, 2019 Revised Notice of Proposed Rulemaking on the Statutory Review of the System for Regulating Rates and Classes for Market Dominant Products, PRC Order No. 5337 (“Revised NPR”). NPMHU was not able to file its report until today due to unforeseen technical difficulties during online filing. NPMHU regrets this delay.

Respectfully submitted,

/s/

Bruce R. Lerner
Joshua A. Rosenthal
Bredhoff & Kaiser, P.L.L.C.
805 Fifteenth Street, N.W.
Suite 1000
Washington, DC 20005
(202) 842-2600

Counsel for National Postal Mail
Handlers Union

Dated: February 4, 2020